

## Butyllithium - Comments of Environmental Defense

(Submitted via Internet 7/8/02)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Butyllithium (CAS# 109-72-8).

The FMC Corporation Lithium Division has submitted a brief Test Plan for n-butyllithium, an unusual compound that is extremely reactive and degrades spontaneously on contact with air or water. In light of these properties, FMC proposes not to generate data for SIDS toxicity or ecotoxicity endpoints (such data do not now exist). We concur that testing this compound is not practical or necessary.

Further, small quantities of n-butyllithium released into the environment would degrade immediately to n-butane and lithium salts, neither of which would be expected to be an environmental hazard. Release of larger quantities could result in catastrophic consequences to those in the immediate area due to combustion or explosion, but would not have persistent effects or result in risks to human health or environmental contamination outside the immediate area. Human health risks are, therefore, limited to occupational settings and persons in the immediate area of a spill.

FMC's test plan details the efforts that it makes to assure appropriate precautions in the use and transport of this chemical. Therefore, we think the limited Test Plan submitted for n-butyllithium is adequate given the very unusual physical/chemical characteristics of this compound.

Thank you for this opportunity to comment.

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